

# **EXHIBIT B**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
ASHEVILLE DIVISION  
CASE NUMBER 1:20CV66**

CARYN DEVINS STRICKLAND,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
UNITED STATES OF AMERICA, et al.,	)	
	)	
Defendants.	)	

**DEFENDANTS' OBJECTIONS AND RESPONSES TO PLAINTIFF'S  
THIRD SET OF INTERROGATORIES**

Pursuant to Federal Rules of Civil Procedure 26 and 33, Defendants, by and through undersigned counsel, hereby provide the following supplemental response to Plaintiff's Interrogatory No. 1. Defendants hereby incorporate all objections and responses lodged in its Objections and Responses to Plaintiff's Third Set of Interrogatories, served on December 21, 2022. Defendants do not waive such objections by service of this supplemental response.

**Interrogatory No. 1:** Identify all persons with knowledge or information relating to the allegations in the civil complaint, including any related denials or defenses asserted in any answer to the civil complaint.

**Objections and Response to Interrogatory No. 1:**

Defendants object to this interrogatory to the extent that it requests information subject to any privilege or restriction on the release of information, including the attorney-client privilege, the attorney work product doctrine, and the deliberative process privilege.

Defendants further object to this interrogatory as overly burdensome and disproportionate to the needs of the case. The complaint in this case consists of 505 paragraphs of allegations, many of which are not pertinent to Plaintiff's claims. To answer this interrogatory would require Defendants to identify persons with knowledge regarding any of those 505 paragraphs. Defendants further object to the extent this interrogatory purports to require Defendants to identify every person with knowledge or information, now matter how minor or immaterial, relating to the allegations in the complaint.

Subject to and without waiving the foregoing objections, the following persons have material knowledge or information relating to the allegations of sexual harassment, discrimination, and/or retaliation in the civil complaint:

- Anthony ("Tony") Martinez  
Former Federal Defender  
Federal Public Defender, Western District of North Carolina
- John Parke ("JP") Davis  
Assistant Federal Defender  
Federal Public Defender, Western District of North Carolina
- Peter Adolf  
Assistant Federal Defender  
Federal Public Defender, Western District of North Carolina
- Joshua B. Carpenter  
Appellate Chief  
Federal Public Defender, Western District of North Carolina
- William ("Bill") Moorman  
Administrative Officer  
Federal Public Defender, Western District of North Carolina
- Heather Beam  
Human Resources Manager  
United States District Court & Probation  
Western District of North Carolina
- Edward ("Ed") Smith

Chief Circuit Mediator  
U.S. Court of Appeals for the Fourth Circuit

- James Ishida  
Circuit Executive  
U.S. Court of Appeals for the Fourth Circuit
- The Honorable Roger L. Gregory  
Chief Judge  
U.S. Court of Appeals for the Fourth Circuit
- Jill Langley  
Director of Workplace Relations  
U.S. Courts of Appeals for the Eighth and Tenth Circuits
- Nancy Dunham  
Former Fair Employment Practices Officer  
Administrative Office of the U.S. Courts
- Lee Ann Bennett  
Deputy Director  
Administrative Office of the U.S. Courts
- Shirley Sohrn  
Former Assistant General Counsel  
Administrative Office of the U.S. Courts
- William Meyers  
General Counsel  
Administrative Office of the U.S. Courts
- Cait Clarke  
Former Chief, Defender Services Office  
Administrative Office of the U.S. Courts
- Sheryl Walter  
Former General Counsel  
Administrative Office of the U.S. Courts
- Amaal Scroggins  
Attorney Advisor, Office of Fair Employment Practices  
Administrative Office of the U.S. Courts
- Brittley Odom  
Former Acting Chief, Staffing Services Branch  
Court Human Resources Division

Administrative Office of the U.S. Courts

- Valerie Farr  
HR Specialist  
Staffing Services Branch  
Administrative Office of the U.S. Courts
- Laura Minor  
Former Associate Director of the Department of Program Services  
Administrative Office of the U.S. Courts
- Kim Llewellyn  
Assistant Circuit Executive for Human Resources  
U.S. Court of Appeals for the Fourth Circuit
- Erin Taylor  
Assistant Federal Defender  
Federal Public Defender, Western District of North Carolina

Defendants have compiled this list after reasonable inquiry with witnesses identified in Plaintiff's Complaint, but reserve the right to supplement this response with additional information learned in the course of discovery.

Dated: April 17, 2023

Respectfully submitted,

BRIAN M. BOYNTON  
Principal Deputy Assistant Attorney General

CARLOTTA P. WELLS  
Assistant Branch Director

/s/ Joshua Kolsky  
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	)
<u>Defendants.</u>	)

**VERIFICATION OF INTERROGATORY 1**

Based on information that I obtained in the course of my official duties, I declare under penalty of perjury that the response to Interrogatory 1 is true and correct to the best of my knowledge and belief.

Dated: April 17, 2023

SIGNED: Colleen M. Papson

Colleen Papson  
Paralegal Specialist  
Office of the General Counsel  
Administrative Office for the U.S. Courts